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FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
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FCC MAIL BRANCH

In the Matter of:

Replacement of Part 90 by
Part 88 to Revise the
Private Land Mobile Radio
Services and Modify the
Policies Governing Them

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PR Docket No. 92-235

COMMENTS OF THE SHERIFF OF SAN DIEGO COUNTY, CALIFORNIA

I. INTRODUCTION

1. The Sheriff of San Diego County, California wishes to thank the Commission for this opportunity to respond to its Notice of Proposed Rule Making (Notice), PR Docket No. 92-235, which seeks to modify the policies for the use of the Private Land Mobile Radio Services (PLMRS) by replacing the existing Part 90 of the Commission's Rules (47 CFR Part 90) with a new Part 88. The San Diego County Sheriff's Department is a Public Safety licensee, and is a member agency of the California Public-Safety Radio Association (CPRA), the Southern California Chapter of the Associated Public-Safety Communication Offices, Inc. (APCO)

2. San Diego County is approximately 4,300 square miles in area, with a total population of 2.65 million. The southern boundary of the County is the border with the United State of Mexico. The San Diego Sheriff's Department has law enforcement responsibility for approximately two-thirds of the County geographically, and a service population of over 726,000. Our patrol areas range from sea-level in coastal communities to altitudes over 6,000 feet in the mountains. Terrain is deeply convoluted by the action of plate tectonics, and is characterized by steep canyons and isolated valleys alternating with hills and mountains of respectable height. Achieving County-wide radio communications adequate to ensure both public and officer safety has always been a challenge for communications engineers and has imposed a severe strain on the County's budget.

II COMMENTS

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The San Diego County Sheriff's Department endorses and supports the comments of APCO, submitted separately to the Commission in this matter. APCO's comments reflect the deep concern of public-safety agencies regarding the continued effectiveness of their communications systems as we approach the end of the century. The comments are detailed and comprehensive, and will not be repeated here. However, There are issues raised by the NPRM which we feel need to be addressed specifically:

1. Proposed limitations on Effective Radiated Power (ERP) and Height Above Average Terrain (HAAT). Limiting transmitter ERP and antenna HAAT will make it extremely costly to maintain a communications system which provides adequate, county-wide coverage in the difficult terrain described above. In an era when local governments are in great fiscal difficulty and struggling just to provide basic services, there is every reason to believe that such a system could not, in fact, be funded. System performance, and thus officer safety, would be drastically compromised.

2. Timetable for refarming 450-512 MHz band. The proposal to convert all systems operating in the 450-512 MHz band from 25 KHZ to 12.5 KHZ bandwidths by 1996 is far too aggressive. Agencies operating in this band should be allowed an opportunity to migrate gracefully to the new channel plan so that existing equipment can be amortized. In addition, the plan to further split these channels to 6.25 KHZ bandwidths by 2004 appears to be unrealistic, given the technical difficulties involved in developing equipment capable of operating on these narrow channels. The APCO proposal to allow existing systems until 2014 to operate is a reasonable approach to the problem.

problems with regard to radio operations on the border with the United States of Mexico. Transmitters in Mexico licensed in the 150-170 MHz band have been a significant interference problem for some time. Stations operating in the 450-512 MHz band are beginning to appear in increasing numbers, and interference with our system is increasing accordingly. Lacking treaty protection or formal agreement with the government of Mexico regarding interference problems below 800 MHz, it is difficult at best to obtain relief from interference originating below the border. It would also be unrealistic to expect that the government of Mexico will follow the United States and impose the same restrictions on bandwidth, deviation, ERP and HAAT in that country that will be required here, under the Commission's proposal. There is a strong possibility that one station in Mexico, operating under "old"